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BY ECF

HONORABLE RAYMOND J. DEARIE
U. S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Bebars Baslan
Docket No. 13 CR 220 (RJD)

Dear Judge Dearie:

I am respectfully requesting yet another extension of time, until mid-October, to file Bebars Baslan's post trial motions. I have some serious medical issues to deal with that I have been largely neglecting while I kept my commitments to the Court, my clients and my professional obligations. To anticipate possible collateral attacks based on this revelation, I can assure the Court and my clients, past and present, in every case, including this one, that I did not allow my medical condition, which is neither fatal nor understood by me or even my physicians, to adversely affect my representation or trial performance: my record will speak for itself.

Without melodrama, my health has been declining ever since an episode over a year ago involving the CJA committee. That episode ended "favorably" to me, as evidenced by the fact that I am still on the CJA Panel, and I have always fulfilled and completed my obligations to the Court and my clients, both private and appointed.

I hope Your Honor considers my request as being made in complete earnestness. I am determined to honor my commitments to the Court, which I have and will always honor and respect, and to all my clients, both private and CJA, including my client in this case, whom I have grown to like, understand and wish to help in reducing what I believe is a grossly disproportionate and unfair mandatory minimum punishment that he faces for the inchoate crime that he committed for the very first and only time in his life, unproven Buffalo allegations notwithstanding. I want to help him, and all my other existing clients, both in the publicly filed and privately conducive arenas.

But, on this very day, I am weak and weary, and ask the Court for forbearance. As it always has been my wont, and often my accomplishment, I will not disappoint in the final product, but I need more time than I had expected to make that happen this time.

I make this application, without troubling the government which, I hope, will be understanding, as the prosecutors in this case have been throughout this very difficult case.

As always, I thank Your Honor for your courtesy and consideration.

Respectfully Submitted,

_____/S/_____
Ephraim Savitt

Cc By ECF: Clerk of the Court (RJD)
All Counsel